

November 30, 2001

To whom it may concern:

This letter is written in support of the U.S. Federal Communications Commission (FCC) Notice of Proposed Rule Making (NPRM) setting forth its tentative decision to change Section 15.225 of the FCC Rules, 47 C.F.R. § 15.225, to allow RFID interrogators operating at 13.56 MHz to transmit data more effectively over longer localized ranges.

Present FCC regulations governing 13.56 MHz devices are significantly more restrictive than the corresponding European regulations. These more restrictive regulations have at least two undesirable consequences. First, RFID products used in the United States operate at greatly reduced range compared to those operated in Europe. This has the affect of precluding the use of radio frequency identification systems in certain product areas for which they are otherwise well suited. Second, the disparity between US and European regulations imposes an additional burden on suppliers of RFID equipment which will have the net result of slowing the widespread adoption of this technology. Internationally compatible standards for radio frequency identification devices are needed to relieve this burden and foster the growth of this technology.

We envision many product applications for RFID technology in areas such as object tracking, item location, inventory management, access control, etc. Most of these applications would benefit from the longer reading ranges which would be possible under the amended regulations. Some of the applications will be difficult to commercialize without this longer read range. One example of an application that would be difficult to implement effectively under the present rules is portal-based tracking and identification. We have received many requests for this type of application from present and prospective customers for our RFID products in the US and around the world. Included among the potential applications of RFID-based interrogation portals are personnel and object identification, validation, and screening, including in the areas of airline baggage verification and processing.

Because of the benefits that RFID technology can provide to a wide range of users, we feel it is in the public interest to adopt the proposed amendment to FCC regulations. In light of the rapidly increasing interest in the applications which would be enabled by this change, we feel the change should be implemented without delay. Accordingly, we ask the FCC to adopt and implement the changes to Section 15.225 of the rules covered by the Notice of Proposed Rule Making.

Sincerely,

Chester Piotrowski, Ph.D.
Division Scientist
3M Company
Bldg. 209-1S-36 3M Center
St. Paul, MN 55144